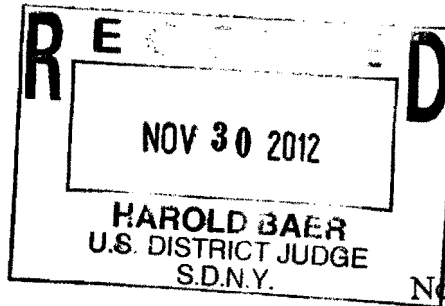


Clayman &
Rosenberg LLP



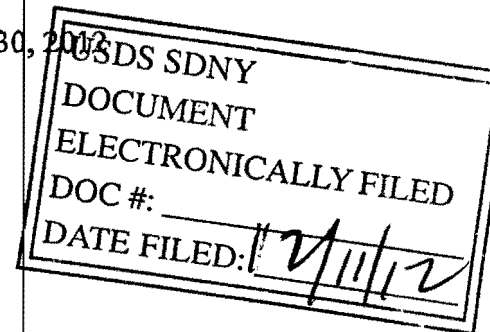
305 Madison Avenue
New York, NY 10165
T: 212-922-1080
F: 212-949-8255

Paul S. Hugel
Partner
hugel@clayro.com

November 30, 2012

VIA FACSIMILE NO. 212 805 7901

Hon. Harold Baer
United States District Court – SDNY
500 Pearl Street, Room 2230
New York, New York 10007



Re: Maclaren Europe Ltd. v. Ace American Ins. Co. - Index No. 11cv4688 (HB)

Dear Judge Baer:

I represent plaintiff Maclaren Europe Ltd ("MEL"). After your Honor's Opinion and Order of November 5, 2012, the Clerk of the Court entered the enclosed Judgment granting MEL's motion for summary judgment. I am writing to request that, pursuant to F.R.C.P. Rule 60(a), the Court direct the Clerk to correct this Judgment so that it clearly explains the relief granted.

At some future date, a court in England or elsewhere may be called upon to give effect to this Judgment. As the Judgment currently reads, a court not familiar with this litigation would be hard-pressed to understand its meaning. It would be necessary for such court to review the pleadings and your Honor's Opinion in order to understand what relief was granted by the Judgment.

Accordingly, we ask that pursuant to Rule 60(a) your Honor Court direct the Clerk to correct the Judgment to state that the Court has declared that the insurance policy issued by Ace American Insurance Company to MEL bearing the number PHFD36724268 remained in full force and effect from April 10, 2006 through April 10, 2007, and that Ace's purported early termination of the policy for non-payment of premium was ineffective. I have enclosed a proposed Amended Judgment for the Court's consideration.

Very truly yours,

cc: Gregory Lahr, Esq. (via email)

Receiving my opinion may be signed but I have signed the enclosed judgment & the Clerk to correct the judgment so ORDERED: Harold Baer, Jr., U.S.D.J. Date: 12/11/12

Paul Hugel

Endorsement:

Reviewing my opinion may be a good idea but I have signed the amended judgment. Nonetheless the endorsement will and does direct the Clerk to enter the judgment.